

From: Boseman, Anita
To: [Diebold, Jay](#)
Cc: [Curtis Bartz](#); [Brown, Jaime](#); [Turner, Thomas](#); [Bergeon, Mark](#); [Zimney, Charles](#); [Stella Karnis](#); ["Rick Verkler"](#) ([Rick.Verkler@cn.ca](#)); [Gebien, Charles](#)
Subject: RE: GTW Bowman Creek Oil Spill Site (AOC # V-W-00-AO-09), South Bend, IN
Date: Thursday, June 23, 2016 3:21:02 PM

Good afternoon,

Thank you in advance for submission of this information, and as we have discussed, the Administrative Record for this site is closed, therefore, GTWR should send all documentation and a copy of this email to: Mr. Todd Quesada, USEPA, Region 5, 77 W. Jackson Blvd., (mail code: SRC-7J), Chicago, Illinois, 60604.

Also, GTWR should indicate on the submission that this information is for the Site File of the GTW Bowman Creek Oil Spill CWA Section 311 Site, South Bend, St. Joseph County, Indiana, as described under CWA Section 311 Administrative Order# V-W-00-AO-09.

Any follow-up questions regarding this site can be directed to Tom Turner, ORC, at (312) 886-6613.

Sincerely,
Anita L. Boseman
Federal On-Scene Coordinator
Reg. 5 U.S. EPA/Superfund Division
77 W. Jackson Blvd. (SE-5J)
Chicago, IL 60604
(312) 886-6941 (tel)
(312) 697-2041 (fax)
boseman.anita@epa.gov

From: Diebold, Jay [mailto:Jay_Diebold@golder.com]
Sent: Friday, June 17, 2016 3:45 PM
To: Boseman, Anita <boseman.anita@epa.gov>
Cc: [Curtis Bartz](#) <Curtis.Bartz@cn.ca>; [Brown, Jaime](#) <brown.jaime@epa.gov>; [Turner, Thomas](#) <turner.thomas@epa.gov>; [Bergeon, Mark](#) <Mark_Bergeon@golder.com>; [Zimney, Charles](#) <Charles_Zimney@golder.com>; [Stella Karnis](#) <STELLA.KARNIS@cn.ca>; 'Rick Verkler' (Rick.Verkler@cn.ca) <Rick.Verkler@cn.ca>; [Gebien, Charles](#) <gebien.charles@epa.gov>
Subject: RE: GTW Bowman Creek Oil Spill Site (AOC # V-W-00-AO-09), South Bend, IN

Anita – it was nice to speak with you again this week. As I mentioned, we are in the process of finalizing our Supplemental Site Investigation Report to reflect data we discussed with you during our October 29, 2015 meeting in your offices and additional data collected in late 2015/ early 2016 for the above referenced site.

During our October 29, 2015 meeting in your offices, we discussed the following key points:

- GTWR has completed the work required under the original AOC, which focused on remediating the active seep of petroleum LNAPL to Bowman creek
- While the seep has been stopped and remediated, there are continuing obligations and potential future liabilities associated with the remaining LNAPL and other impacts found

beneath the GTWR embankment

- Under our revised conceptual site model, we believe that all LNAPL impacts originated from an off-site/up-stream source (i.e. the Former NIPSCO South Bend MGP site) and all future continuing obligations and liabilities should be transferred to the RP for those releases
- However, since the work required under the original AOC has been completed and the matter is considered closed by EPA, there is no basis for EPA to issue a new AOC obligating other parties to assume those continuing obligations and potential liabilities
- In lieu of this, it was suggested that we could build an Administrative Record for this matter that could be used to guide any future EPA orders in the event that new releases should occur from the GTWR embankment area

The details of the Administrative Record were not resolved during our meeting, but we did discuss the following items:

- Submit copies of historical reports documenting the site history and actions completed prior to, a since the March 13, 2001 AOC release letter
- Submit backup for our current CSM interpretation

Since we are nearing the completion of Supplemental Site Investigation Report that documents our current CSM interpretation, we wanted to touch base to confirm the details for building the administrative record with EPA, specifically:

- Should we provide hard copies, electronic copies on CD, or both
- Do we need to include copies of EPA letters issued in response to prior reports
- Should we include copies of any documents associated with the off-site MGP plant that is currently being addressed under IDEM oversight within the Indiana VRP program (note, elements of those reports and data will be incorporated or referenced in the Supplemental Site Investigation Report we are preparing)
- Any other comments or guidance you would like to share

Thanks

Jay

Jay Diebold P.E., P.G. | Senior Consultant & CN US Client Coordinator - Environmental | **Golder Associates Inc.**

N27 W23960 Paul Road, Suite 210, Pewaukee, Wisconsin 53072

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E: JDiebold@golder.com | www.golder.com

From: Boseman, Anita [<mailto:boseman.anita@epa.gov>]

Sent: Tuesday, October 06, 2015 6:15 PM

To: Diebold, Jay <Jay_Diebold@golder.com>

Cc: Curtis Bartz <Curtis.Bartz@cn.ca>; Brown, Jaime <brown.jaime@epa.gov>; Turner, Thomas <turner.thomas@epa.gov>; Bergeon, Mark <Mark_Bergeon@golder.com>; Zimney, Charles <Charles_Zimney@golder.com>; Stella Karnis <STELLA.KARNIS@cn.ca>; 'Rick Verkler' <Rick.Verkler@cn.ca> <Rick.Verkler@cn.ca>; Gebien, Charles <gebien.charles@epa.gov>

Subject: Re: GTW Bowman Creek Oil Spill Site (AOC # V-W-00-AO-09), South Bend, IN

Good evening,

US EPA will confirm Thursday, October 29, 2015 at 10:30 am.

Sincerely,
Anita L. Boseman
Federal On-Scene Coordinator
U.S. EPA/Superfund Div.
77 W. Jackson Blvd.
Chicago, IL 60604
Tel: 312-886-6941
Fax: 312-697-2041

From: Diebold, Jay <Jay_Diebold@golder.com>

Sent: Thursday, September 24, 2015 11:45 AM

To: Boseman, Anita

Cc: Curtis Bartz; Brown, Jaime; Turner, Thomas; Bergeon, Mark; Zimney, Charles; Stella Karnis; 'Rick Verkler' (Rick.Verkler@cn.ca)

Subject: RE: GTW Bowman Creek Oil Spill Site (AOC # V-W-00-AO-09), South Bend, IN

We would like to confirm for Thursday October 29 beginning at 10:00 am. We look forward to meeting with you next month.

Sincerely,

Jay Diebold P.E., P.G. | Senior Consultant & CN US Client Coordinator - Environmental | **Golder Associates Inc.**

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From: Boseman, Anita [<mailto:boseman.anita@epa.gov>]

Sent: Wednesday, September 23, 2015 11:19 AM

To: Diebold, Jay

Cc: Curtis Bartz; Brown, Jaime; Turner, Thomas; Bergeon, Mark; Zimney, Charles; Stella Karnis; 'Rick Verkler' (Rick.Verkler@cn.ca)
Subject: Re: GTW Bowman Creek Oil Spill Site (AOC # V-W-00-AO-09), South Bend, IN

Good morning,

US EPA will be available to meet with you in our Region 5 Chicago office the last week of October, 2015. Please choose one of the following dates:

Wednesday, October 28, 2015 anytime after 11am
Thursday, October 29, 2015 anytime after 10am
Friday, October 30, 2015, anytime after 10am

In the meantime, USEPA will be reviewing our records regarding the AOC V-W-00-AO-09.

Sincerely,
Anita L. Boseman
Federal On-Scene Coordinator
U.S. EPA/Superfund Div.
77 W. Jackson Blvd.
Chicago, IL 60604
Tel: 312-886-6941
Fax: 312-697-2041

From: Diebold, Jay <Jay_Diebold@golder.com>

Sent: Tuesday, September 22, 2015 11:36 AM

To: Boseman, Anita

Cc: Curtis Bartz; Brown, Jaime; Turner, Thomas; Bergeon, Mark; Zimney, Charles; Stella Karnis; 'Rick Verkler' (Rick.Verkler@cn.ca)

Subject: GTW Bowman Creek Oil Spill Site (AOC # V-W-00-AO-09), South Bend, IN

Dear Ms. Boseman,

Attached please find a letter pertaining to the GTW Bowman Creek, South Bend, IN site (AOC # V-W-00-AO-09). This letter provides site background information and answers to the questions you posed in your August 10, 2015 email to Golder.

As noted, we would still welcome the opportunity to meet with you in person to discuss:

- the additional research and investigation results from the 2012-2014 period;
- new information that has come to light regarding releases from the former NIPSCO South Bend MGP site;
- the current conceptual site model with respect to the apparent source or sources for the oil that has been found beneath the GTW railroad embankment; and
- EPA's role in potential modifications to the AOC and direction or review of future site remedial activities and closure

Please advise if a meeting can be arranged.

Sincerely,
Jay Diebold

Jay Diebold P.E., P.G. | Senior Consultant & CN US Client Coordinator - Environmental |
Golder Associates Inc.

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